

**FILED****AUG 23 2023**CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELANDIN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIE EARL JACKSON,  
SHANE PLATS,

Defendants.

INDICTMENT

CASE NO.

Title 18, United States Code,  
Sections 922(a)(1)(A),  
924(a)(1)(D), and 933(a)(1)**JUDGE ADAMS**COUNT 1(Engaging in the Business of Importing, Manufacturing, or Dealing in Firearms without a  
Federal Firearms License, 18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D))

The Grand Jury charges:

1. From on or about June 1, 2023 to on or about August 10, 2023, in the Northern District of Ohio, Eastern Division, Defendant WILLIE EARL JACKSON, not being a licensed importer, licensed manufacturer, or licensed dealer, did willfully engage in the business of importing, manufacturing, or dealing in firearms, those being:

DATE	FIREARM	PRICE
6/15/23	Glock, Model 17Gen5, 9mm pistol, serial number BPSE531	\$900
6/16/23	Smith & Wesson, Model M&P 5.7, 5.7 caliber pistol, serial number PJR3976	\$1700
6/20/23	Palmetto State Armory, Model Dagger Compact, 9mm pistol, serial number FG089628, and a FN Herstal, Model PS90, 5.7x28 caliber rifle, serial number FN142006	\$3300
6/21/23	Smith & Wesson, Model M&P-15, no caliber listed, 556 barrel, serial number SY12126, a Česká Zbrojovka a.s. (CZ), Model CZ Scorpion EVO 3 S1, 9mm-rifle, serial number D187253, a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE42782, and a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE20051	\$4400

6/27/23	Anderson Manufacturing, Model AM-15, multi-cal rifle, serial number 20378924, a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE69170, a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number DEB04721, a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE42735, and a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE42786	\$4000
7/6/23	Ruger, Model P94, .40 caliber-pistol, serial number 341-55400, a Smith & Wesson, Model M&P 40, .40 caliber pistol, serial number HLN4631, a Norinco, Model SKS, 7.62X39mm rifle, serial number 24001291, and an AR-15 style rifle, 5.56mm barrel (no serial number)	\$3260
7/10/23	Diamondback Firearms, Model DB15, Multi Cal-rifle (receiver), 300 black out barrel, serial number DB2768103, a New Frontier Armory, Model C-4, Multi Cal-rifle (receiver), serial number CGH05579, a Palmetto State Armory, Model PSAK47, 7.62x39mm-rifle (receiver), serial number AKB025071, a Ruger, Model P89, 9mm-pistol, serial number 307-64300, a Smith & Wesson, Model SD9VE, 9mm-pistol (frame), serial number FWMxxxx (partially obliterated), a CZ (Česká zbrojovka), Model P-10M, 9mm-pistol (frame), serial number UG08856, a Taurus, Model G2C, 9mm-pistol, serial number TLS39386, a Taurus, Model 856UL, .38spl +P revolver, serial number MC62187, a Hi-Point, Model 995, 9mm rifle, serial number F85788, and a Raven Arms, Model P-25, .25Auto-pistol (frame), serial number 088522	\$8000
7/13/23	Smith & Wesson, Model M&P-15, 5.56mm-rifle (receiver), serial number TJ62190, a Smith & Wesson, Model M&P-15, 5.56mm-rifle (receiver), serial number TW05852, and a Tisas, Model 1911 A1 SS, .45Auto-pistol, serial number T0620-22Z45427	\$4500
7/25/23	Hi-Point, Model 4095, .40 caliber, serial number H59578, an American Tactical, Model Omni Hybrid, Multi-Cal rifle, serial number NS231104, a Springfield Armory, Model 1911 Garrison, .45 pistol, serial number NM732026, and a Ruger, Model PC Charger, 9mm pistol, serial number 913-57610	\$4300
8/3/23	Palmetto State Armory, Model Dagger, 9mm pistol, serial number JJE66626	\$850

all having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(a)(1)(A), and 924(a)(1)(D).



COUNT 2

(Trafficking in Firearms, 18 U.S.C. § 933(a)(1))

The Grand Jury further charges:

2. From on or about June 1, 2023 to on or about August 10, 2023, in the Northern District of Ohio, Eastern Division, Defendant WILLIE EARL JACKSON did ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit:

DATE	FIREARM	PRICE
6/15/23	Glock, Model 17Gen5, 9mm pistol, serial number BPSE531	\$900
6/16/23	Smith & Wesson, Model M&P 5.7, 5.7 caliber pistol, serial number PJR3976	\$1700
6/20/23	Palmetto State Armory, Model Dagger Compact, 9mm pistol, serial number FG089628, and a FN Herstal, Model PS90, 5.7x28 caliber rifle, serial number FN142006	\$3300
6/21/23	Smith & Wesson, Model M&P-15, no caliber listed, 556 barrel, serial number SY12126, a Česká Zbrojovka a.s. (CZ), Model CZ Scorpion EVO 3 S1, 9mm-rifle, serial number D187253, a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE42782, and a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE20051	\$4400
6/27/23	Anderson Manufacturing, Model AM-15, multi-cal rifle, serial number 20378924, a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE69170, a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number DEB04721, a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE42735, and a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE42786	\$4000
7/6/23	Ruger, Model P94, .40 caliber-pistol, serial number 341-55400, a Smith & Wesson, Model M&P 40, .40 caliber pistol, serial number HLN4631, a Norinco, Model SKS, 7.62X39mm rifle, serial number 24001291, and an AR-15 style rifle, 5.56mm barrel (no serial number)	\$3260
7/10/23	Diamondback Firearms, Model DB15, Multi Cal-rifle (receiver), 300 black out barrel, serial number DB2768103, a New Frontier Armory, Model C-4, Multi Cal-rifle (receiver), serial number CGH05579, a Palmetto State Armory, Model PSAK47, 7.62x39mm-rifle (receiver), serial number AKB025071, a Ruger, Model P89, 9mm-pistol, serial number 307-64300, a Smith & Wesson, Model SD9VE, 9mm-pistol (frame), serial number FWMxxxx (partially obliterated), a CZ (Česká zbrojovka), Model P-10M, 9mm-pistol (frame), serial number UG08856, a Taurus, Model G2C, 9mm-pistol, serial number TLS39386, a Taurus, Model 856UL, .38spl +P revolver, serial number MC62187, a Hi-Point, Model 995, 9mm rifle, serial	\$8000

	number F85788, and a Raven Arms, Model P-25, .25Auto-pistol (frame), serial number 088522	
7/13/23	Smith & Wesson, Model M&P-15, 5.56mm-rifle (receiver), serial number TJ62190, a Smith & Wesson, Model M&P-15, 5.56mm-rifle (receiver), serial number TW05852, and a Tisas, Model 1911 A1 SS, .45Auto-pistol, serial number T0620-22Z45427	\$4500
7/25/23	Hi-Point, Model 4095, .40 caliber, serial number H59578, an American Tactical, Model Omni Hybrid, Multi-Cal rifle, serial number NS231104, a Springfield Armory, Model 1911 Garrison, .45 pistol, serial number NM732026, and a Ruger, Model PC Charger, 9mm pistol, serial number 913-57610	\$4300
8/3/23	Palmetto State Armory, Model Dagger, 9mm pistol, serial number JJE66626	\$850

to a Recipient in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the Recipient would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(1).

### COUNT 3

(Engaging in the Business of Importing, Manufacturing, or Dealing in Firearms without a Federal Firearms License, 18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D))

The Grand Jury further charges:

3. From on or about March 1, 2023 to on or about August 10, 2023, in the Northern District of Ohio, Eastern Division, Defendant SHANE PLATS, not being a licensed importer, licensed manufacturer, or licensed dealer, did willfully engage in the business of importing, manufacturing, or dealing in firearms, those being:

DATE	FIREARM
7/27/2023	Palmetto State Armory, Model Dagger Compact JJE66768
7/27/2023	Palmetto State Armory, Model Dagger Compact JJE66624
7/27/2023	Palmetto State Armory, Model Dagger Compact JJE51126
7/27/2023	Palmetto State Armory, Model Dagger SZF001168
7/27/2023	Palmetto State Armory, Model Dagger SZF000480
7/27/2023	Palmetto State Armory, Model Dagger SZF001155
7/27/2023	Palmetto State Armory, Model PA-15 rifle multi-caliber rifle, S/N SCD847614
7/27/2023	Palmetto, model G3-10, multi-caliber rifle, S/N G398740
7/27/2023	Taurus, Model TX22, .22 LR pistol, S/N 1PT392383
7/27/2023	Remington, Model 870, 12-gauge shotgun, serial number RS32231B



7/27/2023	Ruger, Model 18028 (Ruger Precision Rifle), .308 Win-rifle, serial number 1802-04191
7/27/2023	Kriss, Model Vector SDP, 9mm pistol, serial number 919P004452
7/27/2023	Girsan, Model MC28 SA TV, 9mm pistol, serial number T6368-20AV04086
7/27/2023	Marlin, Model 880 SS, .22LR cal-rifle, serial number 04504460
7/27/2023	Noreen Firearms lower receiver, .223 / 5.56 caliber
7/27/2023	Ruger, Model 10/22, .22LR cal-rifle, serial number 354-42176
3/16/23-6/27/23	Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE69170
4/1/23-6/21/23	Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE20051
5/19/23-6/21/23	Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE42782
5/19/23-6/27/23	Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number DEB04721
5/19/23-6/27/23	Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE42735
5/19/23-6/27/23	Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE42786
6/28/23-8/3/23	Palmetto State Armory, Model Dagger, 9mm-pistol, serial number JJE66626

all having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(a)(1)(A), and 924(a)(1)(D).

#### FORFEITURE

The Grand Jury further charges:

4. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the allegations of Counts 1 through 3 are incorporated herein by reference. As a result of the foregoing offenses,

Defendants WILLIE EARL JACKSON and SHANE PLATS shall forfeit to the United States all firearms and ammunition, involved in, or used in the commission of such violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.